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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHAHROOZ RAHIMIAN, individually  
and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

RACHEL ADRIANO, and JUAN  
MARTINEZ, INC.,

*Defendants.*

Case No. 2:20-cv-02189-GMN-VCF

**STIPULATION FOR EXTENSION  
OF TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS'  
MOTION TO DISMISS**

**(First Request)**

Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana hereby stipulate, agree, and move the Court to extend the deadline for Plaintiff to respond to Defendants' motion to dismiss for good cause, in support thereof states as follows:

1. On February 16, 2021, Plaintiff filed an amended complaint adding Defendant Juan Martinez, Inc. d/b/a Century 21 Americana to this action.

2. Defendants Rachel Adriano and Century 21 Americana's motion to dismiss the amended complaint was filed on March 11, 2021 (ECF No. 18). Accordingly, Plaintiff's response is due on March 25, 2021.

3. Plaintiff and Defendant agree that Plaintiff shall have a two week extension of

1 time up to and including April 8, 2021 to file a response to the motion to dismiss. This is the  
2 first request for an extension of time to respond to the motion.

3 4. The extension is requested to permit the Plaintiff and counsel sufficient time to  
4 review and appropriately respond to the opposing party's arguments.

5 5. The stipulated extension will not prejudice the parties, nor will it impact other  
6 deadlines in this case.

7  
8 SO STIPULATED.

9 Respectfully submitted,

10 Dated: March 25, 2021.

11 /s/ Avi R. Kaufman  
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25 *Counsel for Plaintiff and all others similarly situated*

26 KAEMPFER CROWELL

27 Dated: March 25, 2021.

28 /s/ Robert McCoy  
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MARTINEZ, INC.,

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**[PROPOSED] ORDER GRANTING  
STIPULATION FOR EXTENSION  
OF TIME**

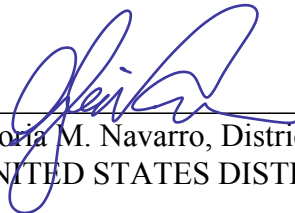
**(First Request)**

On review and consideration of Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana stipulation to extend the deadline for Plaintiff to file a response to Defendants' motion to dismiss and the record, the Court finds good cause to extend the response deadline.

The Court GRANTS the parties' stipulation and provides Plaintiff a one week extension of time, up to and including April 8, 2021, within which to file a response to the motion to dismiss.

**IT IS SO ORDERED.**

Dated this 25 day of March, 2021

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT